

Puget Sound Air Pollution Control Agency

110 Union Street, Suite 500,
Seattle, WA 98101-2038

F A X

June 15, 1998

To: Ash Grove Cement

From: Fred Austin

Attn: Gerry Brown (623-5596)

Phone: 206-689-4055

FAX Number: **623-5355**

FAX: 206-343-7522

Here is the DRAFT permit. Please review & comment. Thanks.

TOTAL PAGES = 3

Tygon Review - 6/15
Mike Dwyer - 6/15
Matt - 6/15

AGCS2M002276

Puget Sound Air Pollution Control Agency

Notice of Construction Worksheet

NOC Number: 7381	Reg. No. 11339	Source Name: Ash Grove Cement Company
Date Received 3/2/98	Due Date: 4/2/98	Source Location 3801 E Marginal Wy S Seattle, WA 98134
Engineer: F Austin	Inspector: E Gilpin	Compliance Issues: Yes <input type="checkbox"/> No <input type="checkbox"/>

A. Project Description

This Order of Approval No. 7381 supersedes Orders of Approval No. 3382, and No. 5730 which added the following equipment: a 120-ton/hour Clinker Pre-grind Crusher with a Baghouse at 20,000 cfm, a Finish Mill High Efficiency Separator Project including two 60-ton/hour High Efficiency Separators with two Baghouses at 77,000 cfm each, two Baghouses at 10,000 cfm each, and one Baghouse at 5,000 cfm.

B. Fees

Invoiced for \$500 modification fee. Fee was paid 3/23/98.

C. SEPA Review

D. Emission Estimate

1. **ACTUAL EMISSIONS**
2. **POTENTIAL TO EMIT**

No change in emissions

A) PRODUCTION RESTRICTIONS

E. Applicable Regulations

1. **PSAPCA**

Regulation I, II, & III

2. **STATE**

WAC 173-401

3. **FEDERAL**

40 CFR 60, Subpart F & 40 CFR 63; Subpart LLL

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F. Technology Review BACT, RACT, LAER

1. **GENERIC BACT BACT FOR STARTUP CONDITIONS**
2. **SIMILAR TO:**
3. **CASE-BY-CASE BACT**

G. AMBIENT Impact Analysis

1. **GENERIC**
2. **SCREEN RESULTS**

H. Public Notice Requirement

DNS

I. Operating Permit or PSD

Title V source

J. Recommended Approval Conditions

3. This source is subject to Subpart A and F of 40 CFR Part 60.
4. PM-10 emissions from each baghouse except the main stack baghouse shall not exceed 0.005 grains/dscf over a twenty-four hour period. Ash Grove may demonstrate compliance with this condition by any of the following:

- (a) Performing a PSAPCA approved source test according to EPA Method 5 or EPA Method 201A;
- (b) Demonstrating no visible emissions for 15 consecutive seconds;
- (c) Demonstrating no visible emissions for three consecutive minutes; or
- (d) Repairing within 24 hours, any baghouse that has visible emissions for more than three consecutive minutes.

Compliance shall be determined for visible emissions using EPA Method 22. PSAPCA may require a source test for any baghouse that has sustained visible emissions, unless such emissions are unavoidable under WAC 173-400-107.

- 5 Except during startup and shutdown of the kiln, scheduled maintenance and for emissions considered unavoidable under WAC 173-400-107, emissions from the main baghouse shall not exceed the most stringent of PSD limits or the following limits:

- (a) Carbon monoxide (CO) shall not exceed 1049 ppm (parts per million) corrected to 10% oxygen (O₂) for an 8 hour average, and CO shall not exceed 2353 tons per year;

- (b) Nitrogen Oxides (NO_x) shall not exceed 700 ppm corrected to 10% O_2 for a 1-hour average, and NO_x shall not exceed 501 ppm corrected to 10% O_2 for a 24-hour average, and NO_x shall not exceed 1846 tons per year;
- (c) Sulfur Dioxide (SO_2) shall not exceed 180 ppm corrected to 10% O_2 for a 1-hr average, and 176 tpy;
- (d) Particulate Matter (PM) shall not exceed 10.6 pounds per hour and 46 tpy.

6. During startup and shutdown of the kiln, and during scheduled maintenance on the main baghouse, all of the emission limits stated in Condition 5 apply, except that emissions from the main baghouse shall not exceed the following limits:

- a. During preheat prior to kiln feed introduction, the SO_2 emission limit for the main baghouse shall consist of compliance with the following work practices and fuel restrictions;
 - 1. Only natural gas shall be used as fuel. Appendix A to this approval shall be followed for heating a cold or warm kiln system and system conditioning after maintenance.
 - 2. Sulfur rings shall be removed from the kiln prior to startup if sulfur ring formation had required the kiln to be shut down.
- b. During ^{Startup} ~~preheat~~ after kiln feed introduction, SO_2 emissions from the main baghouse shall not exceed 200 ppm corrected to 10% O_2 for a one-hour average.
- c. Any shutdown of the kiln shall follow the normal rotation and cool down procedures in Appendix A to this approval for the removal of as much material from the kiln as possible without damaging system components.
- d. During kiln startup, shutdown and scheduled maintenance, NO_x emissions shall not exceed 1000 ppm corrected to 10% O_2 for a one-hour average.
- e. Records of work practices, fuel restrictions, sulfur fuel ring removal, and duration and dates of actions taken under Conditions 6(a), (b), (c) and (d) shall be logged as part of the Operations and Maintenance Plan and submitted as part of the monthly continuous monitoring reports.

Appendix A of this Order defines the startup, shutdown and scheduled maintenance conditions under which these alternate limits apply.

7. Ash Grove shall monitor and report CO , NO_x , SO_2 , and opacity from the main baghouse according to Article 12 of Regulation I. SO_2 emissions from the main stack shall be monitored at all times following the introduction of feed to the kiln.

8. This Order of Approval No. 7381 supersedes and cancels Order of Approval No. 5730 dated December 29, 1994.

Other Comments

Has the source seen this:	YES	Date:	6/15/98
Done By:	FLA	Date:	6/15/98
Inspector Review:	EMG	Date:	6/15/98
Reviewed by:		Date:	
Manager Review:		Date:	

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